

REED SMITH LLP

A limited liability partnership formed in the State of Delaware

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 Social Security Administration, and United States  
 16 Department of Transportation

17 UNITED STATES DISTRICT COURT  
 18 NORTHERN DISTRICT OF CALIFORNIA  
 19  
 20 SAN FRANCISCO DIVISION

21  
 22 STANMORE C. COOPER, a California Resident,

23 Plaintiff,

24 v.

25 FEDERAL AVIATION ADMINISTRATION,  
 SOCIAL SECURITY ADMINISTRATION,  
 26 UNITED STATES DEPARTMENT OF  
 TRANSPORTATION,

27 Defendants.  
 28

Civil Case No.: 3:07-cv-01383-VRW

**STIPULATION AND ~~PROPOSED~~  
 ORDER EXTENDING DEFENDANTS'  
 TIME TO ANSWER OR OTHERWISE  
 RESPOND TO DISCOVERY AND  
 EXTENDING FACT DISCOVERY CUT-  
 OFF AND ALL OTHER  
 CORRESPONDING DEADLINES**

The parties through their respective counsel stipulate and represent that most written and deposition discovery have been completed. They also stipulate and represent that they are in the process of arranging for a day long private mediation to attempt to resolve this case and that the mediation will occur no later than January 31, 2008. In the interim, the parties, through their respective counsel, are in the process of meeting and conferring over a variety of discovery issues that have emerged, and they are hopeful that most if not all of these issues can be resolved before the mediation. As a result, the parties seek a brief extension of time to accomplish mediation in this matter as well as to resolve outstanding discovery disputes.

1. Given these developments, the parties stipulate to extend the following deadlines:

a. All other deadlines set thus far shall be extended as follows:

Fact Discovery Cut-Off: January 31, 2008

Dispositive Motions Cut-Off: February 7, 2008

Dispositive Motions Hearing: ~~March 13, 2008~~ MARCH 20, 2008

Expert Disclosure: March 17, 2008

Expert Discovery Cut-Off: April 28, 2008

Pretrial Conference: May 8, 2008


2. The parties further stipulate that the aforementioned extension of the Fact Discovery Cut-Off is for the sole purpose of addressing discovery-related issues already in discussion among the parties and/or agreed upon by the parties, and does not entitle either party to serve new written discovery or to seek depositions from additional individuals.

No trial date has been set.

IT IS SO STIPULATED.

Dated: 12/5, 2007


REED SMITH, LLP

By:   
JAMES M. WOOD  
TIFFANY RENEE THOMAS

Attorneys for Plaintiff Stanmore C. Cooper

Dated: Dec 5, 2007

SCOTT N. SCHOOLS  
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By:   
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Attorneys for Defendants  
Federal Aviation Administration, Social  
Security Administration, and United States  
Department of Transportation

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~~PROPOSED~~ ORDER

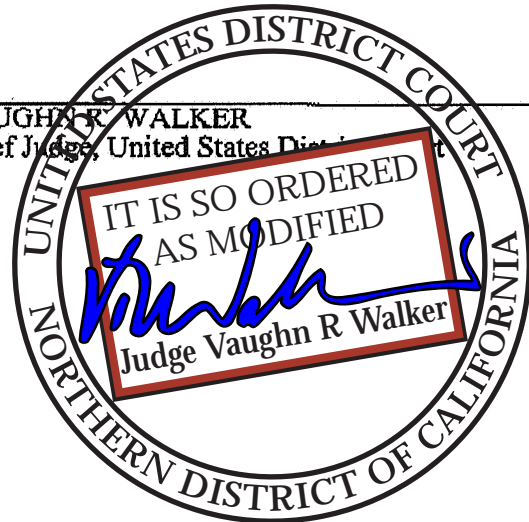
Pursuant to the parties' stipulation and good cause having been shown, it is ordered that:

1. The fact discovery cut-off date is extended to January 31, 2008.
2. The last date for dispositive motions hearing is extended to ~~March 13, 2008~~. MARCH 20, 2008
3. The deadline for expert disclosure is extended to March 17, 2008.
4. The expert discovery cut-off date is extended to April 28, 2008.
5. The Pretrial Conference is set for May 8, 2008.

IT IS SO ORDERED.

Dated: December 12, 2007

VAUGHN R. WALKER  
Chief Judge, United States District Court



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## PROOF OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. I am employed in the office of a member of the bar of this court at whose direction the service was made. My business address is REED SMITH LLP, Two Embarcadero Center, Suite 2000, San Francisco, CA 94111-3922. On December 5, 2007, I served the following document(s) by the method indicated below:

### STIPULATION AND [PROPOSED] ORDER EXTENDING DEFENDANTS' TIME TO ANSWER OR OTHERWISE RESPOND TO DISCOVERY AND EXTENDING FACT DISCOVERY CUT-OFF AND ALL OTHER CORRESPONDING DEADLINES

- ☐ by transmitting via facsimile on this date from fax number 415.391.8269 the document(s) listed above to the fax number(s) set forth below. The transmission was completed before 5:00 PM and was reported complete and without error. The transmission report, which is attached to this proof of service, was properly issued by the transmitting fax machine. Service by fax was made by agreement of the parties, confirmed in writing.
- ☒ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Francisco, California addressed as set forth below. I am readily familiar with the firm's practice of collection and processing of correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in this Declaration.
- ☐ by placing the document(s) listed above in a sealed envelope(s) and by causing personal delivery of the envelope(s) to the person(s) at the address(es) set forth below. A signed proof of service by the process server or delivery service will be filed shortly.
- ☐ by placing the document(s) listed above in a sealed envelope(s) and consigning it to an express mail service for guaranteed delivery on the next business day following the date of consignment to the address(es) set forth below.
- ☐ by transmitting via email to the parties at the email addresses listed below:

Jennifer S. Wang Assistant United States Attorney Michael T. Pyle Assistant United States Attorney 450 Golden Gate Avenue, Box 36055 San Francisco, CA 94102-3495	Attorneys for Defendants Federal Aviation Administration, Social Security Administration, and United States Department of Transportation  Telephone: 415-436-7181 Facsimile: 415-4366748 E-mail: <a href="mailto:jennifer.s.wang@usdoj.gov">jennifer.s.wang@usdoj.gov</a>
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I declare under penalty of perjury under the laws of the United States that the above is true and correct. Executed on December 5, 2007, at San Francisco, California.

  
 Ann H. Devor